UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY RESPONSE BRANCH
9311 GROH ROAD, ROOM 216
GROSSE ILE, MI 48138-1697

00090

MAY 12 1998

REPLY TO ATTENTION OF:

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for Approval to Initiate a Time-Critical Removal Action at the MichCon Station H Site, Detroit, Wayne County, Michigan (Site ID # B552)

FROM: Ralph H. Dollhopf, On-Scene Coordinator
Emergency Response Branch - Section 1

TO: William E. Muno, Director
Superfund Division

THRU: Richard C. Karl, Chief R. Karl
Emergency Response Branch

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to $411,200 in order to mitigate threats to public health, welfare, and the environment at the MichCon Station H (MCH) Site in Detroit, Wayne County, Michigan. This action is necessary to mitigate the immediate threat to public health and the environment posed by the presence of surface soil contaminated with high levels of polychlorinated biphenyls (PCBs) from leaking electrical capacitors and leaking drums containing suspected hazardous substances present at the surface and in waste piles at the site.

The response action proposed herein will mitigate site conditions by removal and off-site disposal of the hazardous substances and wastes in capacitors, drums, and surface soil. The deteriorated condition of the drums and the presence of PCBs in the percentile range in capacitors and surrounding soil require this removal be time critical. A separate action will be subsequently conducted to investigate the extent of subsurface contamination at the site, evaluate removal alternatives (through the performance of an Engineering Evaluation/Cost Analysis (EE/CA)), and implement the selected removal alternative.

The project will require an estimated 30 on-site working days to complete.

The MCH Site is not on the National Priorities List (NPL), has not been ranked, does not set any precedents, and is not nationally significant.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # MID981190002

A. Physical Location and Description

The MCH site is located at 201 South Green Avenue, Detroit, Wayne County, Michigan 48209 (latitude 42°18'1" North and longitude 83°6'19" West). The site is approximately 3.8 acres in size and consists of three separate properties which are located in an urban\industrial area of Detroit. The site is bordered to the northwest by Chesapeake and Ohio Railroad tracks, to the northeast by Post Street, to the southeast by a commercial business, and to the southwest by South Green Avenue and a commercial produce distributor. The nearest residential areas are approximately 0.25 miles south and southeast of the site. Approximately 16,500 people, 14 percent of them black and 26 percent of them Hispanic, live within a 1-mile radius of the site. Homes in the area are 46 percent owner-occupied. The median household income of the area is $13,100. Southwestern High School is located at the southeastern corner of Post and Fort Streets. The school is approximately 500 feet northeast of the site.

B. Site Background

The site was owned and operated by the Detroit City Gas Company (DCGC) between 1913 and 1945 and served as a carburetted water gasification plant. DCGC is currently known as Michigan Consolidated Gas Company (MichCon). Operations at the site ceased in 1945, and the property was sold to the American Charcoal Company (ACC). ACC operated at the site between 1946 and 1976. In 1976, the site was sold to the A and A Scrap Iron Metal Company (A & A). A & A utilized the site as a scrap metal storage and processing facility until 1995 when the site reverted to the State of Michigan due to nonpayment of property taxes.

According to Detroit's Department of Environmental Affairs, the City of Detroit obtained the property from the State of Michigan for Brownfields redevelopment in November 1997, after the Michigan Department of Environmental Quality (MDEQ) conducted a limited removal of surface drums found inside the buildings and scattered throughout site areas. On November 10, 1997, MDEQ removed 37 drums containing various materials including: oils, resins, paint sludges, petroleum distillates, and phosphoric acid. At that time, the City of Detroit scheduled the on site structures and building ruins for demolition in 1999.

Although the main portion of the site was sold by MichCon in 1946, MichCon currently owns two small parcels on the site. One parcel, which is located on the northwestern portion of the site paralleling the railroad tracks, was retained by MichCon because it contains an underlying natural gas line. The second parcel is located at the western corner of the site and is the former location

of a natural gas regulator station. The southeastern portion of the site is the former location of a railroad spur. The present owner of this area is not known.

In August 1984, EDI Engineering and Science (EDI), having been retained by MichCon, conducted an initial site investigation. The scope of the investigation included assessing the air, surface and subsurface soils, and groundwater conditions at the site. Analytical results of samples collected by EDI indicated that the surface soils contain elevated total lead concentrations as high as 1,500 milligrams per kilogram (mg/kg). Groundwater was found to contain elevated concentrations of several inorganic contaminants, including: 15 milligrams per liter (mg/l) cyanide, 0.04 mg/l cadmium, 0.1 mg/l chromium, 1.5 mg/l lead, and 0.65 mg/l nickel. Analyses of groundwater samples also indicated elevated concentrations of numerous polynuclear aromatic hydrocarbons (PNAs), including: 8.8 mg/l fluoranthene, 5.2 mg/l benzo(k)fluoranthene, 8.0 mg/l benzo(a)anthracene, and 8.7 mg/l phenanthrene. EDI concluded that the contaminated aquifer was not used as a drinking water source and that the saturated soils were low in permeability and restricting the migration of contaminants. At the time of the investigation, EDI estimated that groundwater contaminants may have migrated with groundwater flow 100 to 200 feet east of the site.

By the fall of 1997, MichCon and MDEQ had still not been able to agree on plans for a responsible party cleanup at the site.

On January 22, 1998, MDEQ formally requested U.S. EPA's assistance with conducting expedited response actions at the site. On January 29, 1998, U.S. EPA tasked the Ecology and Environment (E&E) Superfund Technical Assessment and Response Team (START) to conduct site assessment activities at the MCH Site.

On February 3, 1998, START conducted a site reconnaissance. START observed that the site consisted of two brick buildings, a concrete pad and building foundation, and three piles of soil and debris. The three piles contained soil, various types of construction debris, and other waste. Many drums were visible in each pile. The lack of fencing on the northeastern side of the site and the absence of gates on the southwestern side allowed for unrestricted access to the site. In addition to the three waste piles, the site was littered with various wastes, including: piles of tires and roofing materials, pieces of concrete and brick, automobile fuel tanks, and empty fuel oil tanks.

Two buildings were located on the western corner of the property. Building 1 contained construction debris and appeared to have been damaged by fire. Building 2 contained municipal waste and construction debris. A concrete pad and building foundation were located northeast of Building 1 and southwest of Building 2. This pad was covered with roofing shingles and debris. The area northeast of Building 2 was littered with various debris, including shingles, roofing debris, tires, and a red-brown pile thought to be metal shavings or cuttings.

Pile 1 was located on the southern corner of the site and consisted of black granular soil, carpeting, bricks, concrete debris, wood, and wooden pallets. Approximately ten 55-gallon steel drums were visible on the southeastern side of the pile. Six of these were lying on their sides beneath the pile. Many of the drums were rusted and deteriorated. Two drums had a black tar or resin-like material which had migrated from the drums down the pile. Pile 1 was approximately 40 feet by 35 feet in area and 12 feet in height.

Pile 2, which was located approximately 200 feet northeast of Pile 1, consisted of tires, concrete and metal debris, red bricks, and black topsoil. Two partially buried drums were visible on the southeastern and western sides of the pile. Trees and grass were growing on the pile. Pile 2 was approximately 30 feet by 18 feet and 8 feet in height.

Pile 3, which was "Y"-shaped, was located on the eastern corner of the site, and a high-voltage electrical tower was located in the center. The pile consisted of black topsoil, sand, gravel, concrete, wood, roofing material, bricks, carpeting, tires, rubber, and other debris. The northwestern portion of the pile consisted primarily of automobile fuel tanks and rusted carcasses of 1-gallon and 5-gallon containers. Dried yellow solids were visible inside the small containers and on the pile. In addition to various debris, several rusted 5-gallon containers, empty drum carcasses, and six partially buried drums were located on the northeastern side of the pile. Pile 3 was approximately 160 feet from east to west by 60 feet from north to south and 10 feet in height.

The southeastern portion of the site appeared to be a former railroad spur which is covered with drums and debris. The railroad spur split from the Norfolk and Chesapeake Railroad line and entered the site at the northern corner. The spur appeared to have extended across the site toward the southern corner and across South Green Avenue. A semitrailer filled with and surrounded by tires was located at the southern corner of the site. One 55-gallon drum was observed among the tires near the semitrailer. Approximately five rusty 55-gallon drums with contents were scattered along the southeastern border. Two additional drums were located approximately 10 feet from Post Street. These drums were both on their sides and labeled, "Agitene, Parts Cleaner" and "Combustible Mixture." Both drums were rusted and deteriorating. One of these drums had a lid that was completely corroded and open.

On February 4, 1998, U.S. EPA and START personnel visited the site to conduct additional reconnaissance. During this reconnaissance, two rusted and decayed capacitors were observed beneath the high voltage power line tower. The capacitors appeared to be old and were suspected to contain polychlorinated biphenyls (PCBs). Soils immediately surrounding one of the capacitors appeared to be stained with oil.

On February 6, 1998, START revisited the site to attempt to sample oil from the capacitors and stained soils. Sample S-1 was collected beneath capacitor 1, and sample S-2 was collected beneath capacitor 2. Sample results indicated sample S-1 contained 100,000 milligrams

per kilogram (mg/kg) or 10 percent of PCB Arochlor 1254. PCB concentrations in sample S-2 were below detection limits.

On February 13, 1998, U.S. EPA, MDEQ, MichCon, and City of Detroit DEA personnel met to discuss the newly-discovered high levels of PCBs as well as the previously-identified wastes at the site (please see attached confidential Enforcement Addendum).

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the MCH Site present an imminent and substantial threat to the public health, or welfare, and the environment and meet the criteria for a removal action provided for in the National Contingency Plan (NCP), Section 300.415, Paragraph (b)(2). 40 CFR § 300.415(b)(2)(i), (iii), (iv), (v), and (vii), respectively, specifically allows removal actions for:

a) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Approximately forty deteriorating 55-gallon drums with unknown contents are visible throughout the site. Several of the drums are partially buried within waste/debris piles located on site. Additional drums may be present. Based upon the types of materials encountered during the 1997 MDEQ drum removal, drums without labeling or markings may contain flammable and/or corrosive materials. Evidence of soil staining beneath a capacitor indicates the contents of the capacitors have leaked onto the ground. A composite residue and soil sample contained high levels of PCBs.

During the February 3, 1998, site visit, START observed the presence of animals on site. Many large dog tracks were observed, and one rabbit was seen on site. Residences and a high school are located in proximity to the site. During the assessment, numerous individuals were observed walking by the site on Post Street. The site was unsecured and readily accessible due to the lack of gates on the southwestern side and lack of fencing on the northeastern side.

Trespassers and animals may contact hazardous materials and disturb drums and their contents. Unauthorized, indiscriminate site access could also result in human exposure to PCBs from leaking capacitors and contaminated soil and to MGP wastes, including heavy metals and PAHs which MichCon's 1984 site investigation documented to be present.

b) Hazardous substances, pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

All drums were located in uncovered areas. Many of the drums were on their sides and in a state of deterioration. Trespassers and animals are likely to disturb drums and their contents. To the extent that MGP wastes and contaminants remain in below grade tanks or other storage structures

(vaults, pits), continued vandalism and uncontrolled destructive activity at the site could result in release of such contaminants to soil (surface and subsurface), and groundwater at the site.

c) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;

Analytical results indicated that surface soils contained elevated levels of PCBs in the percentile range. These results were obtained from a sample composited from soils beneath a capacitor and residue from the capacitor. Historically, older capacitors contained oil with PCBs. There was evidence of soil staining beneath this capacitor, and both capacitors were empty. The MCH site poses a threat of PCBs in surface soils that may migrate. Similarly, releases of PAH compounds characteristic of MGP wastes present in the subsurface may result in continued degradation of the site's groundwater.

d) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

All of the drums and capacitors were located in uncovered areas and subjected to weather. Heavy rains could cause open drums to fill and the contents to overflow. Precipitation and extreme temperatures may cause containers to further deteriorate and release their contents. The PCB-contaminated soils are unprotected from precipitation. Continued precipitation may cause further migration of PCBs.

e) The availability of other appropriate federal or state response mechanisms to respond to the release;

A subsurface removal action will be conducted once removal of surface wastes and contaminants are removed. Although MDEQ has previously committed response resources to the site (1997 drum removal), it currently lacks resources and has requested U.S. EPA's assistance. The City of Detroit has made a tentative commitment to remove nonhazardous surface wastes and debris and to conduct building demolition in an effort to help prepare the site for response actions to address subsurface conditions.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC proposes to undertake the following actions to mitigate threats posed by the presence of hazardous substances at the MCH site:

1) Develop and implement a site health and safety plan and emergency contingency plan;

2) Implement appropriate site security measures;

3) Identify, inventory, and characterize hazardous wastes in drums and small containers found on site;

4) Transport and dispose of hazardous materials/hazardous waste, including electrical capaciters, in compliance with U.S. EPA's Off-Site Rule (40 CFR Section 300.440, 58 Federal Register 49215 September 22, 1993);

5) Conduct an extent-of-contamination (EOC) study of surface soils. Evaluate removal and disposal options for contaminated surface soil; and

6) Dispose of highly contaminated soil identified in the EOC in accordance with appropriate cleanup standards (if necessary).

Subsequent to the time-critical removal action, a comprehensive site investigation, including site sampling and analyses, will be conducted. This is necessary to fully characterize the nature and extent of subsurface contamination at the site and to conduct an Engineering Evaluation and Cost Analysis (EE/CA) that satisfies the requirements of the NCP to address remaining conditions at the site. The EE/CA will be conducted and the removal cleanup alternative selected by U.S. EPA will be implemented.

All hazardous substances, pollutants, or contaminants removed off site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-site Rule, 40 CFR § 300.440, 58 Federal Register 49215 (September 22, 1993).

The OSC has initiated consideration for provision of post-removal site control consistent with the provisions of Section 300.415(l) of the NCP.

The response actions described in this memorandum directly address the actual or threatened release at the site of a hazardous substance, or of a pollutant, or of a contaminant which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the

extent to which that property contributes to the conditions being addressed. It is anticipated that time-critical removal activities will take approximately 30 on-site working days to complete.

The estimated costs to complete the above activities are summarized below. These activities will require an estimated 30 on-site working days to complete. Detailed cleanup contractor costs are presented in Attachment 1.

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:	
Cleanup Contractor Costs	$264,500
Contingency (15%)	39,700
Subtotal	$304,200
Total START	14,000
Extramural Subtotal	$318,200
Extramural Contingency (20%)	63,600
TOTAL, EXTRAMURAL COSTS	$381,800
INTRAMURAL COSTS:	
U.S. EPA Direct Costs $30 x (300 Regional hours plus 30 HQ hours)	$ 9,900
U.S. EPA Indirect costs ($65 x 300 hours)	$ 19,500
TOTAL, INTRAMURAL COSTS	$ 29,400
TOTAL REMOVAL PROJECT CEILING	$411,200

Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) will be complied with to the extent practicable. A letter was sent to Mr. Ed Novak of the MDEQ on April 8, 1998, requesting that the MDEQ identify State ARARs. Any State or Federal ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Continued risk to public health and the environment will result if no action or delayed action ensues.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the MCH Site developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the Site. Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. You may indicate your decision by signing below.

APPROVE: _____ DATE: 5/13/98
Director, Superfund Division

DISAPPROVE: _____ DATE: _____
Director, Superfund Division

cc: K. Mould, U.S. EPA, 5202-G
D. Henne, U.S. Department of the Interior, **w/o Enf. Addendum**
A. Howard, MDEQ, **w/o Enf. Addendum**
R. Harding, MDEQ, **w/o Enf. Addendum**
F. Kelley, MI Dept. of Attorney General, **w/o Enf. Addendum**

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NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ENFORCEMENT ADDENDUM
MICHCON STATION H SITE
APRIL 1998
1 PAGE

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NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

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ATTACHMENT

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
MICHCON STATION H SITE
DETROIT, WAYNE COUNTY, MICHIGAN

ORIGINAL
APRIL 16, 1998

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	04/00/85	EDI Engineering & Science	Michigan Consolidated Gas Company (MichCon)	Report: *Initial Site Investigation--Former Coal Gas Manufacturing Plant, Station H, Green Avenue, Detroit, Michigan*	152
2	12/01/97	Houssari, A., MichCon	Novak, E., MDEQ	Letter re: MichCon Station H Ownership and Liability	5
3	01/22/98	Oyinsan, O., MDEQ	El-Zein, J., U.S. EPA	Letter re: MDEQ's Request for U.S. EPA Assistance at the MichCon Station H Site	1
4	03/30/98	Ecology and Environment, Inc.	U.S. EPA	*Letter Report* for the MichCon "H" Site	35
5	04/08/98	Dollhopf, R., U.S. EPA	Novak, E., MDEQ	Letter re: U.S. EPA's Request for Michigan ARARs for the MichCon Station H Site	1
6	04/28/98	Dollhopf, R., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Determination of Threat to Public Health, Welfare, or the Environment at the MichCon Station H Site (PORTIONS OF THIS DOCUMENT HAVE BEEN REDACTED)	11

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
			UPDATE #1 **MAY 12, 1998**		
1	00/00/00	Dollhopf, R., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request for Approval to Initiate a Time-Critical Removal Action at the MichCon Station H Site **(PENDING)**	

ATTACHMENT 1

DETAILED CLEANUP CONTRACTOR ESTIMATE
MICHCON STATION H SITE
DETROIT, WAYNE COUNTY, MICHIGAN
APRIL 1998

Personnel and Equipment	$143,500
Materials	12,200
Sampling Analysis, Transportation, and Disposal	108,800
Total	$264;500

INDEPENDENT GOVERNMENT COST ESTIMATE
MICHCON STATION H SITE
APRIL 1998
2 PAGES

HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION